

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MARIO ALBERTO CORTES GOMEZ,

Plaintiff,

V.

KENNETH T. CUCCINELLI<sup>1</sup>, Director,  
United States Citizenship and Immigration  
Services, et al.,

Defendants.

Case No. C21-0242-RSM

STIPULATION FOR EXTENSION OF  
TIME

Note on Motion Calendar: April 30, 2021

COMES NOW, Plaintiff, Mario Alberto Cortes Gomez, and Defendants by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 10(g) and 16, and hereby jointly stipulate and move for an extension of 120 days for Defendants to respond to the Complaint. Defendant's responsive pleading to the Complaint is due May 4, 2021.

A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986).

<sup>1</sup> Tracy Renaud is the Senior Official performing the Duties of the Director, U.S. Citizenship and Immigration Services as of January 20, 2021, and should be automatically substituted for Defendant Kenneth T. Cuccinelli under Federal Rule of Civil Procedure 25(d).

1 The parties submit there is good cause for an extension of the deadlines. U.S. Citizenship  
2 and Immigration Services (“USCIS”) has issued a Notice of Intent to Deny (“NOID”). Plaintiff  
3 has 90 days to respond to the NOID. Once the NOID has been adjudicated, this matter might be  
4 resolved without further involvement of the Court. Continuing the existing deadline for a  
5 responsive pleading will allow the parties to conserve resources because they will not have to  
6 expend resources completing work on the case that may become moot (or the issues may change).

7 Therefore, the parties stipulate and agree to a 120-day extension for Defendants to respond  
8 to the Complaint. If the matter is not resolved before then, Defendants will respond to the  
9 Complaint by September 1, 2021.

10 Stipulated to and presented this 30th day of April 2021.

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12 IMMIGRATION LAW

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*Counsel for Defendants*

**ORDER**

The parties having stipulated and agreed, it is hereby so ORDERED.

DATED this 3<sup>rd</sup> day of May, 2021.



**RICARDO S. MARTINEZ**  
**CHIEF UNITED STATES DISTRICT JUDGE**